

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

GT Real Estate Holdings, LLC,

Debtor.<sup>1</sup>

Chapter 11

Case No. 22-10505 (KBO)

**NOTICE OF APPEARANCE AND  
REQUEST FOR SERVICE OF ALL NOTICES AND DOCUMENTS**

**PLEASE TAKE NOTICE** that McDermott Will & Emery LLP hereby enters its appearance (the “Notice of Appearance”), in the above-captioned case as counsel to City of Rock Hill and County of York, South Carolina, pursuant to section 1109(b) of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (as amended, the “Bankruptcy Code”), and rules 2002, 3017(a), 9007, and 9010 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”). McDermott Will & Emery LLP hereby requests that copies of any and all notices and papers filed or entered in this case be given to and served upon the following:

MCDERMOTT WILL & EMERY LLP  
Charles R. Gibbs, Esq.  
2501 North Harwood Street  
Suite 1900  
Dallas, TX 75201  
Telephone: (214) 295-8000  
Fax: (972) 232-3098  
E-mail: [crgibbs@mwe.com](mailto:crgibbs@mwe.com)

MCDERMOTT WILL & EMERY LLP  
David R. Hurst, Esq.  
Maris J. Kandestin, Esq.  
The Nemours Building  
1007 North Orange Street, 10th Floor  
Wilmington, DE 19801  
Telephone: (302) 485-3900  
Fax: (302) 351-8711  
E-mail: [dhurst@mwe.com](mailto:dhurst@mwe.com)  
E-mail: [mkandestin@mwe.com](mailto:mkandestin@mwe.com)

**PLEASE TAKE FURTHER NOTICE** that, pursuant to section 1109(b) of the Bankruptcy Code and Bankruptcy Rule 3017(a), this request includes not only the notices and papers referred to in the Bankruptcy Rules, but also includes, without limitation, any notice,

---

<sup>1</sup> The Debtor and the last four digits of its taxpayer identification number are: GT Real Estate Holdings, LLC (9589). The location of the Debtor’s principal office is 800 South Mint Street, Charlotte, NC 28202.

motion, proposed order, application, petition, pleading, request, complaint, demand, memorandum, affidavit, declaration, presentment, order to show cause, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, hand-delivery, telephone, facsimile, electronically, or otherwise, that is filed or given in connection with the above-captioned case.

**PLEASE TAKE FURTHER NOTICE** that neither this Notice of Appearance nor any prior or later appearance, pleading, or claim waives (i) any right to have final orders in non-core matters arising in or related to the above-captioned chapter 11 case entered only after *de novo* review by a district court judge, (ii) any right to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, (iii) any right to have a district court judge withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) an election of remedies, or (v) any other substantive or procedural right.

**PLEASE TAKE FURTHER NOTICE** that this Notice of Appearance is without prejudice to any other rights, claims, actions, defences, setoffs, or recoupments under agreement, in law, in equity, or otherwise, all of which rights, claims, actions, defences, setoffs, and recoupments against a debtor or any other entity either in this case or in any other action are expressly reserved.

Dated: June 4, 2022  
Wilmington, Delaware

McDERMOTT WILL & EMERY LLP

*/s/ Maris J. Kandestin*

---

David R. Hurst (Del. Bar No. 3743)  
Maris J. Kandestin (Del. Bar No. 5294)  
The Nemours Building  
1007 North Orange Street, 10th Floor  
Wilmington, DE 19801  
Telephone: (302) 485-3900  
Fax: (302) 351-8711  
E-mail: dhurst@mwe.com  
E-mail: mkandestin@mwe.com

and

Charles R. Gibbs (*pro hac vice* forthcoming)  
2501 North Harwood Street, Suite 1900  
Dallas, Texas 75201  
Telephone: (214) 295-8000  
Fax: (972) 232-3098  
E-mail: crgibbs@mwe.com

*Counsel to City of Rock Hill and County of York,  
South Carolina*